

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

In re Nissan North America, Inc. Litigation

Case No. 3:19-00843

District Judge William L. Campbell, Jr.

Magistrate Judge Chip Frensley

JOINT STATUS REPORT CONCERNING ESI DISCOVERY

Pursuant to Section I of the Initial Case Management Order (ICMO) (ECF #118), the parties respectfully submit the following Joint Status Report Concerning ESI Discovery:

1. As indicated in the ICMO, the parties are “working together on e-discovery and negotiating any needed revisions to Administrative Order No. 174-1.”
2. The Parties met about Administrative Order No. 174-1 by the deadline provided in the ICMO, and have agreed that no modifications of Administrative Order No. 174-1 are necessary at this time.
3. Consistent with paragraph 7 of Administrative Order No. 174-1, the parties are continuing discussions about the format of production. On February 5, 2010, Plaintiffs proposed a detailed protocol intended to provide guidance concerning the format of production with the stated intent to minimize any production-related disputes that might require the Court’s intervention. NNA is in the process of evaluating the protocol provided by Plaintiffs.

APPROVED FOR ENTRY:

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel for the parties listed below via first class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party:

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this 14th day of February, 2020.

s/ Brigid Carpenter

Brigid Carpenter